

## **EXHIBIT 6**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**DIRECT TESTIMONY**

**OF**

**STEVE BROWNORTH**

**ON BEHALF OF**

**ITC^DELTACOM COMMUNICATIONS, INC.**

**DOCKET NO. 030137-TP**

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FPSC-COMMISSION CLERK

1   **Q:   PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.**

2   A:   My name is Steve Brownworth. I am an employee of ITC^DeltaCom  
3       Communications, Inc. ("ITC^DeltaCom"), and my business address is  
4       1791 O.G. Skinner Drive, West Point, Georgia 31833.

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6   **Q:   PLEASE DESCRIBE YOUR BUSINESS EXPERIENCE AND**  
7       **BACKGROUND.**

8   A:   My education and relevant work experience are as follows:

9

10       I received a bachelor's degree with a major in Quantitative Methods from  
11       the University of Illinois – Chicago in 1982. I have over 20 years of  
12       telecommunications experience. My experience primarily lies in the  
13       design and deployment of IXC and CLEC architecture.

14

15       Currently I'm the Director of Systems Planning for ITC^DeltaCom. I am  
16       responsible for the network architecture of the local and long-distance  
17       voice network, data network (ATM/Frame/IP) and our fiber optic transport  
18       network. I've been in this position for the last eight years. In my role at  
19       ITC^DeltaCom, I've assisted other companies in their initial network  
20       design and configurations including SoLinc, PowerTel and Mindspring.  
21       These responsibilities include off-net vendor management, the negotiation  
22       of contracts with ITC^DeltaCom's IXC and CAP providers and determining

1           how to best utilize the facilities offered in the interconnection agreement in  
2           the ITC^DeltaCom network.

3

4           Prior to joining ITC^DeltaCom, I spent five years, 1989-1994, with MCI as  
5           Sr. Manager, Network Design, managing strategic designs of their SONET  
6           transmission deployment, real-time restoration and reliability plans,  
7           dynamic switch routing and capital cost justifications. Prior to MCI, from  
8           1982 to 1989, I held management positions with Telecom\*USA,  
9           SouthernNet and Telesphere, in switch network design, traffic  
10          engineering, line cost, and provisioning.

11

12   **Q:   HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

13   A:   Yes.

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15   **Q:   WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

16   A:   The purpose of my testimony is to address unresolved issues concerning  
17          network interconnection and various other network operations issues.

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19   **Issue 8: Integrated or Universal Digital Loop Carrier ("IDLC" and "UDLC")**

20   **Q:   SHOULD BELLSOUTH BE REQUIRED TO PROVIDE AN UNBUNDLED**  
21          **LOOP USING IDLC TECHNOLOGY TO ITC^DELTACOM THAT WILL**  
22          **ALLOW ITC^DELTACOM TO PROVIDE CONSUMERS THE SAME**  
23          **QUALITY OF SERVICE AS THAT OFFERED BY BELLSOUTH TO ITS**

1       **CUSTOMERS?**

2       A:    Yes. IDLC is very important to ITC^DeltaCom because if unbundled local  
3           switching is no longer available or is only available in some areas, then  
4           the quality of loop delivered is critical. It is imperative that ITC^DeltaCom  
5           be able to order a local loop on behalf of the end user customer and that  
6           local loop should receive the same quality of service that BellSouth  
7           currently offers that same customer. In other words, BellSouth should not  
8           provide a degraded local loop to ITC^DeltaCom. By having access to  
9           IDLC technology or ensuring that there are no additional analog to digital  
10          (A to D) conversions, the end user consumer will be assured, when they  
11          move from one carrier to another, that they will have the same quality local  
12          loop.

13  
14       **Q:    WHY IS THE ANALOG TO DIGITAL (A TO D) CONVERSION CONCEPT**  
15       **IMPORTANT?**

16       A:    Additional A to D conversions cause problems associated with quality  
17           voice call, fax, and dial-up internet services. BellSouth's position seems to  
18           be that if the loop meets the minimum voice grade standards for the  
19           customer, regardless of quality of the local loop pre-conversion, it has met  
20           its obligations to ITC^DeltaCom. However, the customer perceives and  
21           experiences a degradation in service. Customers' typical experiences in  
22           this regard include problems with modem speed on dial-up internet/data  
23           services, fax, noise/static on the line and other quality issues.

1

2 **Q: BELLSOUTH'S POSITION ON IDLC IS FOR ITC^DELTACOM TO**  
3 **FOLLOW THE NEW BUSINESS REQUEST PROCESS. HOW DO YOU**  
4 **RESPOND TO THIS?**

5 **A:** We have been working with BellSouth on the implementation of language  
6 that requires no additional analog to digital conversions into our local  
7 service orders and the network. Therefore no new business request  
8 should be required.

9

10 Furthermore, IDLC technology is not new and should not require a new  
11 business request from BellSouth. IDLC technology makes the BellSouth  
12 network more efficient by relying on less copper wire, providing protection  
13 switching, forwarding alarms, and working with larger size line counts in  
14 terms of the efficiency of network itself. If IDLC is not used by BellSouth  
15 the manner that ITC^DeltaCom is serviced will translate into additional  
16 signal regeneration, additional amplifiers, additional use of copper, all of  
17 which causes increased cost to BellSouth as well as poor quality to the  
18 consumer.

19

20 BellSouth does not give ITC^DeltaCom a clear alternative in the migration  
21 of customer IDLC loops to ITC^DeltaCom without causing additional A to  
22 D conversions. It is important for the customer to receive the same level  
23 of service and quality on the loop with BellSouth as with ITC^DeltaCom.